

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

<b>IN RE: Russell and Alisha Brooks</b>	}	<b>CASE NO. 15-80927</b>
	}	<b>CHAPTER 13</b>

**MOTION TO MODIFY PLAN**

Comes now Russell and Alisha Brooks, Debtors, and moves to modify their Chapter 13 Plan after confirmation and shows the Court as follows:

1. The Debtor's filed this chapter 13 on the 29<sup>th</sup> day of August 2015 and the chapter 13 plan was confirmed on November 9, 2015;
2. The Debtor's filed a modified chapter 13 plan on the May 10, 2016 and it was confirmed on June 17, 2016;
3. The debtor Russell Brooks has had medical issues and will have to take off work for approximately two months for medical procedures on his heart and will not be receiving sufficient income to pay the plan payments for the months of April and May of 2018;
4. The Debtors propose to modify the plan to change their plan to allow them to skip the plan payments for two months of the plan;
5. As a result of the proposed request to Modify the Plan, the secured claims will not be paid for two months.

WHEREFORE, Debtor respectfully moves the Court for an Order for Allowing the Debtors to Modify their Plan Post Confirmation.

Respectfully submitted,  
Russell and Alisha Brooks

By: /s/ Terry D. Bigby  
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**CERTIFICATE OF MAILING**

Terry D. Bigby, attorney for Debtors, does hereby certify that on 6-5-18, true and correct copies of the Motion to Modify, Notice of Motion and Modified Plan Notice of Incorporation of Terms of Original Plan And Statement of Material Changes to Treatment of Claims were mailed by electronic mail or first class mail with proper postage prepaid to all creditors listed on the mailing matrix and all interested parties.

Dated: June 5, 2018

/s/ Terry D. Bigby

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